



U.S. Department of Justice

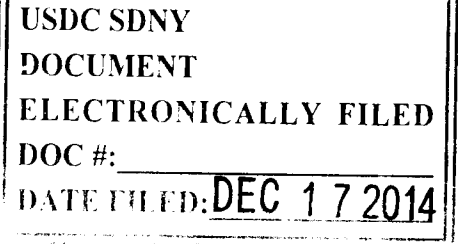
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 16, 2014

By Electronic Mail and ECF

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *United States v. Ross William Ulbricht, S1 14 Cr. 68 (KBF)*

Dear Judge Forrest:

The Government writes in response to the order of the Court, dated December 12, 2014, in which the Court ordered the parties to confer regarding a list of terms likely to arise at trial, and whether there was any likelihood that the parties could reach stipulations as to definitions. The Government has consulted with counsel for the defendant, and has begun preliminary discussions regarding this issue.

However, given the additional matters that the Court has requested that the Government brief in advance of tomorrow's pretrial conference, the Government respectfully requests additional time to continue discussions with defense counsel regarding stipulations as to definitions of various terms. Accordingly, the Government respectfully requests leave to file a joint list of proposed definitions with the Court by December 19, 2014. The Government has consulted with Joshua Dratel, Esq., counsel for the defendant, who consents to this application.

Respectfully,

PREET BHARARA
United States Attorney

By: /s/ Timothy T. Howard
TIMOTHY T. HOWARD
SERRIN TURNER
Assistant United States Attorneys
Southern District of New York
(212) 637-2308/1946

Cc: Joshua Dratel, Esq. (by electronic mail)

Ordered
Fine. I just want us
to discuss the concept
at the FPTC today.
I don't need the
stip. before 12/30.

K B. For 12/17/14
usdj